

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION**

**GERALD RUHNOW; CONNIE RUHNOW,** )  
Plaintiffs, )  
v. ) CIVIL ACTION NO. CV 2:05-cv-527-F  
**LANE HEARD TRUCKING, LLC.,** )  
**et al.,** )  
Defendants. )  
**NORTHLAND INSURANCE CO.,** )  
Intervener, )  
v. )  
**LANE HEARD TRUCKING, LLC.,** )  
**et al.,** )  
Defendants. )

## **PLAINTIFFS' PROPOSED VOIR DIRE**

COME NOW the plaintiffs and hereby request that this Court add the following questions to the jury questionnaire in the above referenced matter:

1. Have you or any member of your immediate family ever been involved in a motor vehicle accident?  
If so, please give the specifics of that accident.
  2. Have any of you ever had a family member killed in a motor vehicle accident?

3. Have any of you ever witnessed a motor vehicle accident?  
If so, please give the specifics of that accident.
4. Do you or any member of your immediate family have any experience driving an 18-wheeled tractor/trailer?
5. Do you or any member of your immediate family hold, or have ever held, a job that requires you to travel by motor vehicle on highways or interstates frequently and/or over long distances.  
If so, please describe the nature of your employment, including whether or not such employment related travel occurs at night.
6. Do any of you or any member of your immediate family have experience driving a motorcycle?  
If so, how long have you been driving a motorcycle?
7. Have you ever been involved in an accident while driving a motorcycle?  
If so, describe the nature of that accident.
8. Do any of you know any of the parties in this lawsuit?  
If so, which one(s)?  
How long and how well have you known them?
9. Do any of you know any of the attorneys involved in this action?  
If so, which one(s)?  
How long and how well have you known them?
10. Are you familiar with Highway 231 in Pike County, south of the City of Troy?  
If so, how frequently do you travel on Highway 231 in Pike County, south of the City of Troy?

11. Do any of you, for any reason at all, feel that you could not serve on this jury and base your verdict solely on the evidence and law presented to you?
12. We all bring our own life experiences and beliefs to this courtroom. Do any of you feel that for any reason at all you would tend to lean toward one party or the other in this lawsuit?
13. Do you know personally, professionally, or in any way any of the following individuals who may be witnesses in this lawsuit:
  - a. Gerald Ruhnow
  - b. Connie Ruhnow
  - c. Jimmy Lane Heard
  - d. Marilyn Heard
  - e. Christy Leann Champion
  - f. Michael Adkins
  - g. Randall Jackson
  - h. Gene Richardson
  - i. Mrs. Gene Richardson
  - j. Trooper Kevin Cook
  - k. Trooper Jimmy Helms
  - l. Dr. James Cross
  - m. Ronnie Perkins
  - n. Chris Bloomberg
14. Do you know anyone who works for or with Jordans Towing in Troy, Alabama?
15. Do you know anyone who works for or with Jacobs Towing in Troy, Alabama?

Respectfully submitted,

/s/ J. Callen Sparrow  
J. Callen Sparrow (ASB-4515-R79J)  
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CERTIFICATE OF SERVICE

I hereby certify that on January 16, 2007, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:

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/s/ J. Callen Sparrow  
Of Counsel